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December 4, 2017

Chairman Ajit Pai
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions, and related issues (GN Docket No. 12-268; ET Docket No. 14-165; MB Docket No. 15-146; ET Docket No. 16-56)

Dear Chairman Pai:

The Retail Council of New York State, on behalf of more than 5,000 merchants, strongly supports efforts by the Federal Communications Commission (FCC) to expand broadband Internet service throughout the country. Specifically, we write today in support of the referenced proposal.

The role of high speed Internet in operating a successful retail establishment continues to grow in importance - it is no longer a luxury, but a crucial component to remaining competitive in today's marketplace. Brick-and-mortar stores no longer compete solely with merchants in their local community, but are forced to compete with Internet-based companies that may have little to no presence in the state. Access to broadband Internet allows retailers with a physical nexus in New York State to expand their customer base beyond the confines of their specific locality, while also giving them the opportunity to directly compete with a growing number of Internet-based stores.

Despite this reality, approximately 2.5 million homes in New York State have limited or no access to high-speed Internet, according to the New York State Broadband Program Office. This figure does not include those businesses facing the same connectivity issues throughout the state - a troubling situation for businesses and Americans in the 21st Century.

We believe that any and all solutions to providing broadband, including TV White Space technology, should be carefully considered by the FCC as it looks to close this gap in coverage. If approved and implemented, this initiative - and the joint effort of the public and private sector - would be a crucial development for both the retail industry and consumers who currently experience barriers to Internet access. As such, the Retail Council urges the adoption of the captioned proposal.

Sincerely,

A handwritten signature in black ink, appearing to read "Ted Potrikus".

Ted Potrikus
President and CEO